

EXHIBIT A



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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiff,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd., a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and wife;
Brian Colvin and Corrina Colvin, husband
and wife; John Simon and Jean Simon,
husband and wife; William Mcewen and
Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband and
wife; and Does 1 through 10, inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**DECLARATION OF ROSS P. MEYER
IN SUPPORT OF MOTION TO DEEM
PLAINTIFF'S OPPOSITION TO
DEFENDANTS MOTION TO
SUMMARY JUDGMENT FOR
PLAINTIFF'S LACK OF STANDING
(DOC. 63) TIMELY AND RESPONSE
TO MOTION TO STRIKE (DOC. 65)**

I, Ross P. Meyer, declare as follows:

2. I am an attorney at Enara Law PLLC (“Enara Law”).

4. After taking over the role, undersigned counsel began reviewing and updating firm policies, such as implementing a quarterly docketing calendar review and a calendar review specific to the firm's cases before this Court.

6. During that review, I instructed Associate Attorney Morgan E. Silva to review this matter's docket to determine whether an oral argument hearing had been set for the appellants' Motion for Summary Judgment to allow undersigned counsel adequate time to begin preparing for such oral argument.

8. Upon an internal review, it was determined that the Firm Manager and an Advanced Certified Paralegal, responsible for docketing all case deadlines, had inadvertently selected Arizona Superior Court Rules instead of the Federal Rules to set the Opposition deadline in the firm's online Clio docketing system. Due to this inadvertent error, the docketed date was set for April 9, 2025.

11. Ms. Watts notified Ms. Silva and I that she saved the document to this
 's folder.

1 12. Generally, upon receipt of filings, Ms. Witgen or Ms. Watts save the filings
2 to a matter's folder and place the filing in the Firm's Slack docketing thread for the filing
3 response to be docketed. Ms. Watts did not place the Motion to Strike and Reply in the
4 Firm's Slack docketing thread, not recognizing that a Motion to Strike had also been filed
5 along with the Reply, requiring a docketing of the response.

6 13. Upon further review of the circumstances, it became clear that when the
7 Motion to Strike and Reply was filed by Represented Defendants it was classified by this
8 Court in the 'Docket Text' section as a Reply to Response to Motion. (the "Notice Email")

9 14. Upon review of the Notice Email, I relied on the classification by this Court
10 that the document was a Reply to Mr. Dimitrov's Opposition.

11 15. On June 6, 2025, Ms. Silva recognized that the 'Docket Text' had been
12 amended to include the Motion to Strike. *See* Ex. F. The 'Docket Text' now reads as
13 "**Motion to Strike 65 Response to Motion, Reply to Response to Motion. . . *Modified*
14 *to add motion part on 4/25/2025 (EJA).*"

15 16. At no time did I receive an updated Notice Email modifying the original
16 'Docket Text.'

17 17. In bringing this to the firm's attention, undersigned counsel has worked with
18 staff and is currently working to implement additional check points to confirm accurate
19 docketing, in addition to calendaring through Clio, weekly emails of all upcoming
20 litigation deadlines, and an attorney-staff meeting in which the deadlines are specifically
21 discussed.

22 18. I declare under penalty of perjury that the foregoing is true and correct.

23 **DATED** this 11th day of May 2025.

24
25
26 By:



Ross P. Meyer